



April 24, 2023

Lyric Jorgenson, PhD  
Acting Associate Director for Science Policy  
NIH Office of Science Policy  
6705 Rockledge Drive  
Bethesda, MD 20892

**RE: Response to NIH Request for Information on the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research**

Dear Dr. Jorgenson:

Thank you for the opportunity to share our views on NIH's plan to enhance public access to the results of NIH-supported research. We appreciate this important feedback mechanism and look forward to working with NIH and other stakeholders to deliver meaningful outcomes that advance open science and research. We support the objectives set forth in the memo released by the White House Office of Science and Technology Policy (OSTP) of Ensuring Free, Immediate, and Equitable Access to Federally Funded Research and we hope to work with NIH to ensure scientists have the tools necessary to communicate their research for the advancement of science.

Founded in 1807, Wiley is one of the world's largest publishers and a global leader in research and education. For more than 215 years, we have been enabling discovery, powering education, and shaping workforces. As the nation's largest scientific and scholarly research publisher and the world's leading disciplinary society publishing partner, we are proud to publish nearly 2,000 academic journals which, together, brought more than 280,000 unique pieces of scholarship to the world in 2022. As the publishing partner for numerous scholarly societies in the United States, such as the Federation of American Societies for Experimental Biology, the American Heart Association, the American Cancer Society, the Alzheimer's Association, the American Geriatrics Society, and the Obesity Society, we publish over 13,000 NIH funded articles each year.

America's scientific leadership and competitiveness are supported by a thriving scholarly communication ecosystem of researchers and institutions, public and private. Together we are creating the tools and infrastructure to advance research in the 21st century, and ensuring this system is imbued with the values that underpin the U.S. research community – rigor and integrity; academic freedom; openness; partnership; diversity, equity, and inclusion (DE&I); and respect for innovation, commercialization and intellectual property rights.

We appreciate that the efforts described by NIH are focused on public access. It is our firm belief that in order to be truly effective, any public access policy should promote open access and open science and in doing so should:

- Endorse the final published Version of Record (VoR)<sup>1</sup> as the article format which will deliver the full benefit of open access (OA) to the scientific community;
- Include a federal funding mechanism that recognizes the cost of peer-review, editing, publication, distribution, and long-term stewardship of articles; alleviating the administrative and financial burden of publishing costs from universities, libraries, and individual researchers; and
- Leverage the many services currently provided by publishers to advance discovery and innovation, thereby avoiding a duplication of efforts and investments already made in support of open access and open science.

### **1. How to best ensure equity in publication opportunities for NIH-supported investigators.**

Wiley supports equitable publication opportunities for NIH-supported investigators. As a service to the researchers we work with, we currently facilitate the automatic deposit of the accepted article<sup>2</sup> into PubMed Central (PMC) after the one-year embargo for articles published under the subscription journal model and deposit the VoR into PMC immediately when articles are published under open access.

***Ensure all NIH Supported Investigators have the opportunity to publish the most trusted version of their research article open access.***

Open access publication of the VoR as an option for all is integral to achieving equity in publication opportunities.

The VoR provides transparent access to all of the publication ethics practices and standards that are applied to the author's manuscript both leading up to and following publication including:

- the names and affiliations of the editors;
- peer review model;
- required protocols and reporting guidelines, e.g. CONSORT, STROBE, ARRIVE; etc.
- conflict of interest policies;
- corrections;
- expressions of concern;
- retraction notices; and
- other research integrity safeguards journals have in place to uphold trust in peer review; trust in research; and ultimately trust in scientific practice.

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<sup>1</sup> NIH nomenclature refers to the Version of Record (VoR) as the "final published article"

<sup>2</sup> NIH nomenclature refers to the accepted article as the "peer-reviewed manuscript"

None of this critical information would be made available on external repositories holding only the accepted articles.

A large percentage of federally funded authors who publish in Wiley journals are based at R1<sup>3</sup> institutions, many of which have Transformative Agreements (TAs) or open access accounts with Wiley. This means their Article Publication Charges (APCs) will be covered under those agreements. Any future policy should ensure that federally funded authors who are not covered under an institutional agreement should also have access to funding that will allow them to publish the VoR open access in order that the final, published, maintained and linked version of their work is available to the widest possible audience.

***Ensure funding is available to support a diverse publishing ecosystem that maximizes author choice.***

As the Publisher of a wide range of journals and journal types, from those with highly selective publishing policies to those with more inclusive approaches, we are acutely aware that different journals have different costs and resource requirements. A mechanism to ensure that this variety of journals can continue to deliver the services they provide is vital to the ongoing diversity of the scholarly record. We urge NIH to recognise that all public access business models have costs and require some form of funding to ensure they are sustainable, be that through the subscription model or an open access model. There are no cost-free routes to public access.

Supporting a Green OA route to public access and removing embargoes without providing adequate funding for Gold OA, and alternative OA models, will severely threaten the sustainability of journals and ultimately limit publication choice for NIH funded researchers. The provision of publishing services come at a cost, irrespective of OA model, and without funding to cover these costs, many journals will struggle to remain financially viable meaning that the number of trusted publication venues will decrease, ultimately limiting publication choice for researchers.

Furthermore, it is important to note that some of our partner scholarly societies have expressed concern over the new public access policies because such policies could have negative impacts on the DE&I efforts currently underway in their communities. Revenues from many society journals are essential for the operations, services, and products key to the mission of smaller scholarly societies, including their activities relating to improving DE&I. Any reduction in journal publishing revenues could negatively impact their ability to fulfill their missions and serve the needs of their members and jeopardize the societies' ability to sustain high-quality publishing activities.

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<sup>3</sup> R1: Doctoral Universities – very high research activity

***Allow NIH Funded Investigators freedom to license their rights as they wish to protect the integrity of their work and publish in their venue of choice.***

Agency requirements restricting NIH Funded Investigators' ability to license their rights, for example through a rights retention mandate, could significantly limit publication options. A 'one size fits all' approach to licensing could be problematic as publication requirements, and in particular reuse requirements, can vary considerably for individual Investigators depending on the subject areas and types of content that they are publishing. Allowing NIH Funded Investigators to choose how they want to license their rights and share their work would be the most equitable option.

## **2. Steps for improving equity in access and accessibility of publications.**

At Wiley, we believe everyone should be able to access the research they need. We welcome opportunities to expand access to the results of federally funded research in a way that maintains research integrity and provides maximum benefit to the public and the American scientific enterprise, in coordination with federal funding agencies. We are committed to fulfilling that mission through our significant investment in open science.

***Ensure all readers have immediate access to the most trusted version of the research article that connects all other outputs including supporting data.***

Open access to the VoR, supported by other research outputs, is the best way to improve equity in access and accessibility of publications. Only the final published VoR article delivers the full benefit of open access. In addition to the metrics, metadata, and context associated with the VoR outlined in our response to Question 1 above, many research artifacts from the research lifecycle such as preprints, open data, code, protocols (to name a few), are linked to the final VoR. Directing readers to the final publication, the VoR, provides transparent, linked access to all associated research artifacts which will ultimately validate the quality and integrity of the research process. An NIH Supported Investigator uploading an accepted article into a repository would not benefit from this verified interlinking of connected outputs and they would not receive the same visibility, level of engagement, and community recognition that they would otherwise achieve through the sharing of the final VoR publication. By supporting the publication of the VoR on journal platforms, readers can verify the mechanisms through which publishers support and uphold research integrity thereby ensuring trust in the authors work; continued trust in peer review, trust in research, and ultimately trust in scientific practice.

Open access is just one part of the open science ecosystem. At Wiley we are supporting open science practices and opening up more research outputs beyond the research article. Wiley was a founding member of CHORUS and the Initiative for Open Citations (I4OC) and we are enabling research data to be shared (and particularly Findable, Accessible, Interoperable, and Reusable

“FAIR” data) by defining standard criteria for repository selection, qualification and certification. We offer Transparent Peer Review making the associated peer review history openly available in a growing number of our journals. Nearly 75% of Wiley Journals currently support Preprints and via our Under Review service on Authorea we are working to streamline the early sharing of research, making the peer review process even more transparent. Making more research outputs open and reusable not only ensures integrity at every stage of the research process, but also reduces the unnecessary duplication of research, saving billions in research funding.

### **3. Methods for monitoring evolving costs and impacts on affected communities.**

New costs that will arise from updated NIH public access requirements could impact equity in the scientific research community. To protect the scientific ecosystem and make it more robust and equitable, NIH should consider efforts to improve equity in research funding, understanding what sustainable high-quality publishing and repository costs entail, and educating the NIH research community to adopt cultural changes so that researchers become accustomed to including OA publishing costs in their research proposals and spending research funds on publishing in their venue of choice.

#### ***Ensure the infrastructure and support is in place to help NIH funded Investigators and their Research Institutions budget for publishing costs.***

Funding agencies such as NIH should help researchers to budget for anticipated publishing costs, and should consider creating a dedicated fund to support open access publication costs. If such a fund is fairly distributed, it could help to tackle inequality in publishing opportunities, create transparency for the monitoring of costs and impact of the new mandates, and avoid the problem of placing additional financial burdens on individual researchers and libraries.

We are aware that OA fund management can be extremely challenging and investment in tools and services to support Institutions and Funders is needed to build a sustainable and effective open science infrastructure. OAble, an open access management software solution, was developed by Knowledge Unlatched (a Wiley company) with significant stakeholder input to effectively manage the ever-growing complexity of OA activities and changing business models. Continued investment in these kinds of tools is needed to ensure Institutions and Funders can effectively manage OA funding.

Most current OA funding systems are built to accommodate corresponding author funder mandates and policies, with the assumption that the corresponding author is often also the grant recipient and responsible for funding acknowledgement. All stakeholders must be able to measure and address the administrative and open access funding burdens that would arise if co-authors are required to comply with federal agency public access policies.

***Work with publishers to develop requirements for better price and service transparency.***

Wiley is actively working towards greater transparency by helping our customers to understand the value of the services we provide. We provide public access to data related to the peer review services we provide (turnaround times, acceptance rates), engagement (usage), impact (citations, media references (Altmetric), author contributions (CRediT), and re-use (scite). In 2022, Wiley provided data to the Plan S Price and Service Transparency Framework and Journal Comparison Service (JCS) with the aim of providing more transparency around the services that we provide. To date, we are the only major academic publisher participating in this initiative.

**4. Early input on considerations to increase findability and transparency of research.**

Access to high quality research for diverse, global audiences is vital for achieving open science. Information has to be discoverable. Wiley doesn't just make content available; we enable content to be found, providing the best opportunities for it to be discovered, so that the right audiences are aware of the latest research. Throughout our multi-step publishing process, we adhere to industry-accepted standards, from discoverability and archiving to presentation of published content.

***Make use of existing tools, initiatives and skills to avoid duplication of effort.***

We support the FAIR principles and recognize the benefits of large-scale bibliometric analysis of research outputs that may lead to greater scientific and medical discovery. In 2022, we signed on to participate in the Initiative for Open Abstracts (I4OA) which allows for Crossref deposit and interrogation of abstract metadata. In addition, we support unrestricted access to article metadata on our publishing platform (Wiley Online Library) including abstracts, references, funder acknowledgements, data availability statements, and in many cases important contextual information like lay summaries and patient summaries.

We are continually investing in improvements and innovations in response to the evolving needs of the communities we serve while ensuring responsible, ethical publishing and preservation practices. By investing in new technologies and initiatives, we enable knowledge to be created, accessed, shared, and discovered more quickly on a global scale. Publishers have the skill and capacity to invest in maintaining the integrity of the VoR and in increasing the findability and transparency of research outputs, we recommend that NIH make best use of existing tools and initiatives to avoid unnecessary costs and duplication of effort.

***Work with stakeholders to agree on a set of scholarly PIDs and open and non-proprietary metadata, to enable attribution to original publication sources.***

The importance of having an appropriate and interoperable infrastructure to support these services cannot be underestimated. Crucial to this shared infrastructure is a set of commonly agreed persistent identifiers (PIDs) for researchers and organizations. These include the Open Researcher Contributor identifier (ORCID), the Research Organization Registry (RoR), and the Digital Object Identifier (DOI) for different scholarly outputs. An agreed set of scholarly PIDs and open and non-proprietary metadata, to enable attribution to original publication sources, has many benefits and is key to reproducibility and research integrity. Machine reading can then link and mine different research outputs and connect them to researchers or organizations, as well as to grants and different projects. This will enable verification, replication, discovery, and the reporting and tracking of research outputs, people, projects, and organizations.

### **Concluding Thoughts**

Wiley is committed to a future in which research is open. Last year 47% of the articles we published were done so under an open access license. We are committed to providing open access to the final, trusted version of record as the best way to accelerate open science, and to ensure that the published version remains the linchpin that connects numerous essential research outputs that add value and insight to the article itself. A sustainable transition to an open science future relies upon all stakeholders making a commitment to ensure that any future policies are financially and technically supported, and we are ready and willing to work collaboratively to make this a reality using the systems we have built to support scientific collaboration, integrity, and the research enterprise.

Where publishers are not provided the opportunity to fully participate in implementation and delivery discussions, or to collaborate on innovation and new business model development, solutions will remain inherently inequitable and our ability to achieve open science will be hindered. Ultimately, our mission is to serve researchers. We must ensure that under no circumstances will the quality of the works we publish and the valuable services that journals and societies provide to communities be compromised. In addition, we urge you to carefully review the responses you receive from smaller, less well-funded professional societies who make an important contribution to scientific and medical research in the United States. Without the diversity of specialized knowledge these societies, and their publications, contribute to the global scholarly ecosystem, the United States will begin to fall behind our global competitors.

We look forward to working with NIH and the wider scientific community on these issues and are committed to working collaboratively to develop forward-looking partnerships that strengthen research and innovation and deliver on the promise of open science. The stakes have never been higher, and we must leverage the entrepreneurial spirit of the research community and private sector to enable our country's continued leadership in the scientific enterprise.

Sincerely,

A handwritten signature in black ink, reading "Jay Flynn". The signature is written in a cursive, flowing style.

Jay Flynn  
Executive Vice President and General Manager - Research  
Wiley